

The Honorable Barbara J. Rothstein

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

TELEBUYER, LLC,

Plaintiff,

v.

AMAZON.COM, INC., AMAZON WEB
SERVICES LLC, and VADATA, INC.,

Defendants.

AMAZON.COM, INC., AMAZON WEB
SERVICES LLC, and VADATA, INC.,

Counterclaimants,

v.

TELEBUYER, LLC,

Counterclaim-
Defendant.

Case No. 2:13-cv-01677-BJR

**[REDACTED] AMAZON'S
OBJECTIONS TO TELEBUYER'S
PROPOSED TECHNICAL ADVISOR
CANDIDATE**

1 On the November 5, 2014 teleconference with the Court, both parties agreed that the
2 most important requirement for a Technical Advisor here is real technical expertise concerning
3 the core Internet and telephone communications technologies underlying this action. Telebuy-
4 er's proposed Advisor, REDACTED, does not satisfy this requirement.

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James Kurose is a

true expert, and has been so for the entire relevant period. Professor Kurose is a Distinguished Professor of Computer Science at the University of Massachusetts, and has been actively researching, developing, and teaching the core technologies involved in this action for over thirty years. (D.I. 177 at p. 5) In addition to his work as a professor, Dr. Kurose has worked as a visiting scientist in IBM's Communications Department from 1990 to 1991, and for Thomson/Technicolor in 2006 and 2012. (*Id.*) He is an IEEE Fellow, and has received numerous accolades and awards for his work as a computer scientist. (D.I. 177 at pp. 5-8.) Most importantly, Professor Kurose's work has remained focused on the Internet and other computer and telephone networks, communications, and related technological issues. (D.I. 177 at pp. 5-31.) And, to the

²REDACTED

1 extent important to Telebuyer, Professor Kurose has been employed twice as an expert in patent
2 litigation, once by a plaintiff and the second time by a defendant.

3 For these reasons, Amazon respectfully asks the Court to appoint Professor Kurose^{REDACTED}

November 7, 2014

Respectfully submitted,

By: s/ Richard G. Frenkel

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AMAZON.COM, INC., AMAZON WEB
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CERTIFICATE OF SERVICE

I, Richard G. Frenkel, hereby certify that on November 7, 2014, I caused the foregoing **[REDACTED] AMAZON'S OBJECTIONS TO TELEBUYER'S PROPOSED TECHNICAL ADVISOR CANDIDATE** to be served on the following parties as indicated below:

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November 7, 2014

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